

449945-00

# LEWIS & HARRISON

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December 11, 1999

Janet L. Andersen, Ph.D., Director  
Biopesticides and Pollution Prevention Division (7511C)  
Office of Pesticide Programs  
Environmental Protection Agency  
1921 Jefferson Davis Highway  
Crystal Mall#2  
Arlington, VA 22202

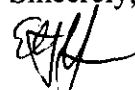
**re: Product: AtEze**  
**EPA File Symbol No. 70688-E**  
**EPA Petition No. 8F5035**  
**Your Letter Dated November 29, 1999**

Dear Dr. Anderson:

On behalf of Eco Soil Systems, Inc., I am responding to your letter noted above. The letter asked Eco Soil to revise the AtEze product label, address certain Product Chemistry issues involving the identification of *Pseudomonas chlororaphis* and the manufacture of AtEze and to clarify the nature of the test substance used in the previously submitted acute toxicology studies. Eco Soil's responses to each of these items are presented on the attached pages. In addition, an updated Confidential Statement of Formula (CSF), with Eco Soil listed as the applicant/registrant, is attached.

If you have any questions about this submission, please contact me at (202) 393-3903.

Sincerely,



Eliot I. Harrison  
Agent for Eco Soil

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re: **Product: AtEze™**  
**EPA File Symbol No. 70688-E**  
**EPA Petition No. 8F5035**  
**Data Transmittal Letter for Studies Support FIFRA Section 3(c)(5) Registration**

Dear Dr. Anderson:

On behalf of Eco Soil Systems, Inc., I am submitting three (3) copies of the following studies:

- Volume 1 of 2  
Amended Manufacturing Process and Quality Control/Quality Assurance  
Procedures for AtEze  
MRID# **44994501**
- Volume 2 of 2  
Conservation of the 2,4-Diacetylphloroglucinol Biosynthesis Locus Among  
Fluorescent Pseudomonas Strains from Diverse Geographical Locations  
MRID# **44994502**

If you have any questions about this submission, please contact me at (202) 393-3903.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eliot I. Harrison', written over the word 'Sincerely,'.

Eliot I. Harrison  
Agent for Eco Soil Systems